

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

KEITH COLE, JACKIE BRANNUM, RICHARD §
KING, MICHAEL DENTON, FRED WALLACE, §
and MARVIN RAY YATES, individually and on §
behalf of those similarly situated, §

Plaintiffs, §

v. §

BRYAN COLLIER, in his official capacity, §
ROBERTO HERRERA, in his official capacity, and §
TEXAS DEPARTMENT OF CRIMINAL JUSTICE, §

Defendants. §

CIVIL ACTION NO.
4:14-cv-1698

PLAINTIFFS' MOTION FOR CONTEMPT, TO SHOW CAUSE & SANCTIONS

Exhibit 6

Declaration of C. Bell

DECLARATION OF CURTIS BELL

1. My name is CURTIS BELL.
2. My date of birth is 11/22/1982.
3. My TDCJ number is 1784451.
4. I have been an inmate in the Texas Department of Criminal Justice (TDCJ) since May 25, 2012.
5. I am assigned to the LeBlanc Unit at G-P-31 top.
6. I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated herein are within my knowledge and are true and correct.

CB O I HAVE BEEN ASSIGNED TO THE LEBLANC UNIT SINCE
OCTOBER 2018.

CB O ON MOST DAYS WHEN I AM IN MY HOUSING AREA
AT LEBLANC THIS SUMMER, I HAVE FELT HOT AND
SWEATY.

CB O THE HALLWAY OUTSIDE MY HOUSING AREA IS MUCH
COOLER THAN MY HOUSING AREA DURING THE
SUMMER.

CBO | AM NOT PERMITTED TO ACCESS COLD

SHOWERS AT THE LEBLANC UNIT.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Signature Curtis W. Bell Dated: 7/19/19

Printed Name: Curtis W. Bell